

<b>TELEPHONE RECORD OF COMMUNICATION (TCR)</b>	
<b>Date:</b> January 31, 2000	<b>Time:</b> 1:00 P.M.
<b>Caller:</b> Kendra Kennell, ARTD/RESP	<b>Spoke With:</b> Lynn Richardson, Nulex, Inc. 712-943-3989
<b>Subject of Conversation:</b> Zinc/ Iron Crystals Usage and Storage at Nulex Facility <b>Facility Name:</b> Nulex Inc. <b>RCRA I.D. Number:</b> IAR000007310	
<p align="center"><b>DESCRIPTION OF CONVERSATION</b></p> <p>EPA performed a RCRA compliance evaluation inspection (CEI) at the facility on September 22, 1998. Samples of the zinc/ iron crystals taken during that inspection failed the Toxicity Characteristic Leaching Procedure (TCLP) for selenium. The re-use of waste zinc/ iron crystals in the manufacture of fertilizer is considered a use constituting disposal. If the crystals are used to produce fertilizer, Nulex would be in violation of several RCRA requirements.</p> <p>I returned Mr. Richardson's phone call regarding the January 20, 2000 Letter of Warning send to his facility. In this letter, I requested that Mr. Richardson call me to set up a meeting to discuss compliance issues with the zinc/ iron crystals used in the facility granulation plant to produce animal feed and fertilizer. During our conversation, Mr. Richardson stated that the granulation plant had ceased operating in June of 1999. Since Nulex no longer uses the zinc/ iron crystals in their operations, it is not necessary that the facility meet with EPA to discuss compliance issues.</p> <p>I asked Mr. Richardson to see if any zinc/ iron crystals were still in storage. I told him that I would check with my management to see what would be necessary to show that this issue had been resolved.</p>	



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